



**BlueCross BlueShield
of Illinois**

Mike Mannion
Vice President
Illinois Government Relations

September 19, 2012

Sent via electronic submission to
<http://www2.illinois.gov/gov/healthcarereform/Pages/default.aspx>

Jennifer McGowan
Illinois Health Care Reform Implementation Council

Re: Illinois Essential Health Benefits

Dear Ms. McGowan:

On behalf of Blue Cross and Blue Shield of Illinois, a division of Health Care Service Corporation (BCBSIL), we are writing in regards to the Illinois Health Care Reform Implementation Council's (HRIC) request for comment on an essential health benefits benchmark plan for Illinois.

As you are aware, the Center for Consumer Information and Insurance Oversight (CCIIO) has set out an intended regulatory approach to defining "essential health benefits" through 2015. Under this approach, a state would select a "benchmark" plan, from one of four pre-defined "benchmark plan types":

(1) the largest plan by enrollment in any of the three largest small group insurance products in the State's small group market ("Small Group benchmark option");

(2) any of the largest three State employee health benefit plans by enrollment ("State Employee benchmark option");

(3) any of the largest three national FEHBP plan options by enrollment ("Federal Employee benchmark option"); or

(4) the largest insured commercial non-Medicaid Health Maintenance Organization (HMO)

401 East Capitol Avenue, Suite 4.402 • Springfield, IL 62701-1711 • mike_mannion@bcbsil.com
Office: 217-698-2217 • Mobile (1): 217-725-2081 • Mobile (2): 312-810-6714

A Division of Health Care Service Corporation, a Mutual Legal Reserve Company, an Independent Licensee of the Blue Cross and Blue Shield Association



**BlueCross BlueShield
of Illinois**

Mike Mannion
Vice President
Illinois Government Relations

operating in the State ("Commercial non-Medicaid HMO benchmark option").

The selected plan would then form the cornerstone of what constitutes essential health benefits in that State.

BCBSIL believes that, of the four benchmark plan type options, the Small Group benchmark option is the most appropriate, and therefore respectfully recommends that Illinois select one of the plans within that option.

BCBSIL's recommendation is based on our belief that a plan from the Small Group benchmark option best reflects the type of covered services and benefits that Illinoisans with individual and small group coverage find important, have come to rely upon, and are most familiar with; contains those benefits that the Illinois Legislature believes are necessary to be included in small group coverage sold in the State, and would be a plan from a product with which the Illinois Department of Insurance has regulatory experience and expertise.

We hope the HRIC finds our comments helpful in its deliberations. BCBSIL remains committed to providing affordable health care choices, exceptional services, and critical information for our members. We will continue to work closely with employer groups, members, providers, lawmakers and regulators to support a market that works for our customers, is sustainable over time, and provides the broadest coverage options possible.

Please feel free to contact me if you have any questions.

Sincerely,

Michael J. Mannion
Vice President – Government Relations
(217) 698-2217
Mike_Mannion@bcbsil.com

401 East Capitol Avenue, Suite 4.402 • Springfield, IL 62701-1711 • mike_mannion@bcbsil.com
Office: 217-698-2217 • Mobile (1): 217-725-2081 • Mobile (2): 312-810-6714

A Division of Health Care Service Corporation, a Mutual Legal Reserve Company, an Independent Licensee of the Blue Cross and Blue Shield Association